

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

July 17, 1990

Mr. Guy Grieco
Vice President, Operations
Medical and Hazardous Waste Management
4001 Boston Road
Bronx, New York 10466

Dear Mr. Grieco,

Thank you for your letter of June 1, 1990, regarding the tracking of regulated medical waste (RMW) shipments which are split by the transporter. Your letter indicates that when RMW is received at a transfer station the generator's RMW may be split into one or more allocations and loaded onto different transport vehicles for further transport to the same or different destination facilities.

The 40 CFR Part 259, Standards and Management and Tracking of Medical Waste are currently effective in five states which include New York and New Jersey. These regulations require the tracking of regulated medical waste from the point of generation to the point of disposal using the uniform tracking form found in Part 259, Appendix I. Section 259.75(a) indicates that the transporter must deliver the entire quantity of regulated medical waste (RMW) that he has accepted from a generator or another transporter to:

- (1) The intermediate handler or destination facility listed on the tracking form; or
- (2) The next transporter.

As noted in your letter, transporters of RMW often redirect waste onto larger trucks located at transfer stations, prior to shipping the waste to an intermediate handler or destination facility. Section 259.76(c) outlines the procedures which are to be used for consolidation and remanifesting of regulated medical wastes. However, there are no provisions in Part 259 for splitting a load from one generator after it has been accepted from that generator. The current regulations require the entire quantity must be delivered to the intermediate handler, destination facility or the next transporter. Therefore, it is not possible for the Agency to approve any procedure for splitting a load of regulated medical waste.

Should you have any further questions regarding this matter, please contact Mary Greene of my staff at (202) 475-8551.

Sincerely,

David Bussard,
Director Characterization and Assessment

cc: George Meyers, Region II
Dave MaFrici, NYDEC

FaxBack # 11542

